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LAW DEPARTMENT
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Marina Moraru
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November 19, 2024

VIA ECF

Hon. Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *C.E. v. New York City Dep't of Educ.*, 24-cv-5904 (KPF)(RFT)

Dear Judge Failla:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 30-day extension of Defendant's time to respond to the Complaint, from November 25 to December 26, 2024. This is the second request for an extension, the first extension having been granted on August 20, 2024 (ECF 9). Defendant also respectfully requests that the joint status letter due November 25 be adjourned to December 26, 2024 as well. Plaintiff consents to these requests. The parties have exchanged multiple settlement offers and need additional time for further settlement discussions. This office has settled all but one fees-only case commenced by Plaintiff's counsel without the need to burden the court with conferences or motion practice. The parties are hopeful this matter will follow the same course.

Accordingly, Defendant respectfully requests that Defendant's time to respond to the complaint be extended to December 26, 2024, with a next joint status letter due that same date.

Thank you for considering these requests.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.
Special Assistant Corporation Counsel

cc: Michele Kule-Korgood (via ECF)

Application GRANTED. Defendant's deadline to answer, move, or otherwise respond to the Complaint is hereby ADJOURNED to **December 26, 2024**. The parties' deadline to submit a joint status letter is also hereby ADJOURNED to **December 26, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 10.

Dated: November 20, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE